



TEXAS DEPARTMENT OF AGRICULTURE  
COMMISSIONER SID MILLER

**Texas Community Development Block Grant Program  
Updates & Reminders for TxCDBG Application  
Submission**

Good afternoon and thanks for joining us for today's **Updates & Reminders for TxCDBG Application Submission** webinar. I'm Michelle Phares and I work with the Texas Community Development Block Grant Program. Also joining me are.....

A couple housekeeping items before we get started:

Please mute your lines at this time. If you have questions, feel free to use the instant messenger feature or ask during the questions portion following each program's section.

Also, please note that the slides and notes pages for this webinar will be posted on the TDA Training web page after the presentation.

Let's get started!



## Agenda

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1. Overview
2. Updates
3. Questions?

Today's webinar is going to be fairly brief. First, there will be a quick overview of the TXCDBG fund categories, deadlines and very general requirements. Then, since we've been getting a lot of the same questions about recent changes, I'm going to briefly review program updates. Lastly, we will open the lines to answer questions about any of the four program applications currently due in September.



## Overview – Fund Categories

- Community Development (CD)
- **Colonia Fund – Construction (CFC)**
- Colonia Fund – Planning (CFP)
- **Downtown Revitalization & Main Street (DRP/MS)**
- **Fire, Ambulance, and Service Truck (FAST)**
- **Planning and Capacity Building (PCB)**
- State Urgent Need (SUN)

The 2020 application cycle opened earlier this year with an initial round of programs, including Colonia Fund Construction, the Downtown Revitalization & Main Street Programs, the Fire, Ambulance and Service Truck (or FAST) Fund, and the Planning and Capacity Building Fund.



## Overview - Deadlines

Program	Updated Deadline
Colonia Fund – Construction (CFC)	September 1, 2020
Downtown Revitalization & Main Street (DRP/MS)	September 1, 2020
Fire, Ambulance, and Service Truck (FAST)	September 1, 2020
Planning and Capacity Building (PCB)	September 1, 2020

Each of these applications is due September 1.



## Overview - General Application Requirements

- A completed 424 Form with signature  
(i.e. scanned copy of wet ink signature or digital signature that complies with TxCDBG Project Implementation Manual requirements)
- All application forms, fully completed
- A passed/adopted Local Government Resolution authorizing submission of the application
- Evidence of compliance with the TxCDBG Citizen Participation Plan including the Public Hearing Notice
- Legible, quality maps
- Applicant's Annual Audit FY2018 or later (Independent Auditor's letter) and
- Documentation of an active [SAM Registration](#)
- Documentation of project's satisfaction of National Program Objective

**Applications lacking any of the items listed above will be disqualified**

This is a list of general requirements that apply across fund categories. There are elements, specific to each fund, that must also be included, so please reference your respective application guides. The biggest piece of advice I can give is to submit a complete application. All of the documents listed are required and without them an application will be disqualified.



## General Application Updates



- Citizen Participation
- Pre-Agreement
- Application Submittal Requirements
- Beneficiary/Service Area Guidance

Now, lets review recent program updates, including:

- Citizen Participation
- Pre-Agreement
- Application Submittal Requirements
- Beneficiary/Service Area Guidance



## Updates – Citizen Participation



Public notice documentation for the required public hearing and notice of application availability for public review may be provided in one of the following ways:

1. Full page of newspaper with publication title and date
2. Publishers affidavit and a copy of the notice for the required public hearing
3. Affidavit of posting in public place (see app guide appendices), copy of the notice, and screenshot/printout of the publication of notice on applicant's website (NEW)

Citizen Participation. Previously, applicants had two options in documenting compliance with citizen participation requirements. Now there is an additional option.

Applicants now have the option to post the public notices (for public hearing and application availability) at City Hall/County Courthouse/and other widely accessed locations AND post the public notice on the applicant's website to satisfy this requirement. Both the posting in a public place and publication on the website is required to fully satisfy this element.

If your community does not have a website, please proceed with options 1 or 2.



## Updates – Pre-Agreement Request



- Pre-agreement request now included in application document under “Additional Project Information”
- No pre-agreement letter submitted as attachment

PRE-AGREEMENT REQUEST FOR ADMINISTRATION & ENGINEERING	
The Applicant intends to proceed with its Downtown Revitalization Program or Main Street Program project per the pre-agreement costs strategem: <input checked="" type="radio"/> Yes <input type="radio"/> No	
As a condition of this pre-agreement, I	<input type="text"/> acknowledge and agree to the following:
<p>1. Applicant will comply with all applicable state and federal laws, including procurement procedures for professional services and applicable vendors; all applicable TxCDBG policies and procedures, including a completed Environmental Assessment necessary for the Release of Funds (for construction activities) by TxCDBG, acquisition requirements, approval of plans and specifications by the Texas Commission of Environmental Quality (TCEQ), Davis Bacon wage requirements, and any applicable contract Special Conditions.</p> <p>2. The Department shall not reimburse any costs under this agreement until a Downtown Revitalization Program or Main Street Program contract is fully executed with the Applicant. Department shall not be liable for costs incurred prior to the most recent, published, DRP/MS application due date or for any activities not included in Exhibit A, Performance Statement, and Exhibit B, Budget of the executed contract associated with the 2020 grant.</p>	
Signature: _____	Date: _____

Pre-agreement. In past application cycles, pre-agreement has been requested via attachment as a letter from the applicant.

Now pre-agreement is included as a drop-down option in the additional project info section of the application. Also, be sure to have your authorized signatory sign this section.





## Updates – Application Submittal Requirements



- TDA offices remain closed to the public. TDA is modifying the application submission procedures.
- All Applications for TxCDBG Funding must be submitted electronically to TDA:
  - Submit all applications to [CDBGapps@TexasAgriculture.gov](mailto:CDBGapps@TexasAgriculture.gov)
    - The emailed application = the document of record
    - TDA strongly discourages mail delivery for applications
    - NO hand-delivered applications
  - Please use subject line: [Fund Acronym] – [Name of Applicant]
    - Example: DRP/MS – Sample City
    - Example: CFC – Sample County

Application Submittal Requirements. Due to the current pandemic conditions, TDA offices remain closed to the public. Therefore, TDA is modifying the application submission procedures. All Applications for TxCDBG Funding should be submitted electronically to TDA, as follows:

- Submit all applications to [CDBGapps@TexasAgriculture.gov](mailto:CDBGapps@TexasAgriculture.gov)
  - The emailed application will be the document of record
  - TDA strongly discourages mail delivery for applications – application materials mailed to TDA that arrive after the application due date will not be considered part of the original application. (Note: in the future, applications may only be accepted electronically)
  - TDA will NOT be accepting hand-delivered applications
- Please use the following subject line: [Fund Acronym] – [Name of Applicant]
  - Example: DRP/MS – Sample City
  - Example: CFC – Sample County



## Updates – Application Submittal Requirements



- The email **must** include a complete scanned PDF copy of the application
  - Maps must be legible and not folded
  - Newspaper publications must be scanned
  - Surveys: include Survey Tab Form in the single PDF document
  - If survey not previously approved: include separate attachment with complete survey documentation (Survey Tab Form, Address List, Survey Questionnaires)
- The PDF application must be signed by the authorized official
  - Scanned copies of the wet ink signature are acceptable
  - Digital signatures that comply with the TxCDBG Project Implementation Manual are acceptable

- The application submission email **must** include a complete scanned copy of the application as a single PDF document
  - Maps must be legible and not folded
  - Newspaper publications must be scanned as described in the application guide
  - If an income survey was performed, please include the Survey Tab Form in the single PDF document. If the survey has not been previously approved (i.e. if it does not include TDA staff initials), attach the complete survey documentation (Survey Tab Form, Address List, Survey Questionnaires) as a separate document
- The PDF application must be signed by the authorized official
  - Scanned copies of the wet ink signature are acceptable
  - Digital signatures that comply with the TxCDBG Project Implementation Manual requirements are also acceptable (See [Chapter 2, page 6](#))



## Updates – Beneficiary/Service Area Guidance



- Survey Methodology Manual updated in March 2020
- Important updates include:
  1. Changes to beneficiary documentation requirements
  2. Changes to Margin of Error (MoE) requirements
  3. Changes to PHA certification requirements
  4. Nursing homes as businesses
  5. No combining survey and LMISD
  6. No combining place data and block group data
  7. Alternative Survey Strategies for Social Distancing (added May 1, 2020)

Beneficiary/Service Area guidance. TDA published an update to the existing Survey Methodology Manual in March 2020. Important updates include:

1. Changes to beneficiary documentation requirements
2. Changes to Margin of Error (MoE) requirements
3. Changes to PHA certification requirements
4. Nursing homes as businesses
5. No combining survey and LMISD
6. No combining place data and block group data
7. Addition of alternative socially-distant survey strategies



## Updates – Beneficiary/Service Area Guidance



Once a service area has been identified, there are two (2) acceptable methods applicants can use to document beneficiaries:

1. Low-to-Moderate Income Summary Data (LMISD)

OR

2. Surveys

Once a service area has been identified, there are two (2) acceptable methods applicants can use to document beneficiaries:

1. Low-to-Moderate Income Summary Data, also known as LMISD

OR

2. Surveys



## Updates – Beneficiary/Service Area Guidance



- Use LMISD when:
  - The service area **can** be “reasonably delineated” by standard census geographic areas
  - A geography that is entirely enclosed by a service area would be included in the calculation of beneficiaries.
  - In instances where a geographic area is partially overlain by the service area, a determination of the **block** (not block group) population within the service area is to be calculated.
    - If this population is  $\geq$  70% of the total geographic area population, then the LMISD for this geography would be included.
    - If  $<$  70% of the block group population is in the service area, then the applicant will need to conduct a survey of the ENTIRE service area

Applicants should use Low to Moderate Income Summary Data (LMISD) to document beneficiaries when the service area can be “reasonably delineated” by LMISD geographies. LMISD Geographies include cities, counties, census designated places and census tracts or block groups. A geography that is entirely enclosed by a service area would be included in the calculation of beneficiaries. One example of this would be when the boundaries of an applicant’s proposed service area are concurrent with the applicant’s city limits.

However, in cases where a geographic area is partially overlain by the service area, a determination of the **BLOCK** (not block group) population within the service area is to be calculated.

- If this population is 70% or more of the total geographic area population, then the LMISD for this geography would be included
- If less than 70% of the block group population is in the service area, then the applicant cannot use this method and will need to conduct a survey of the ENTIRE service area

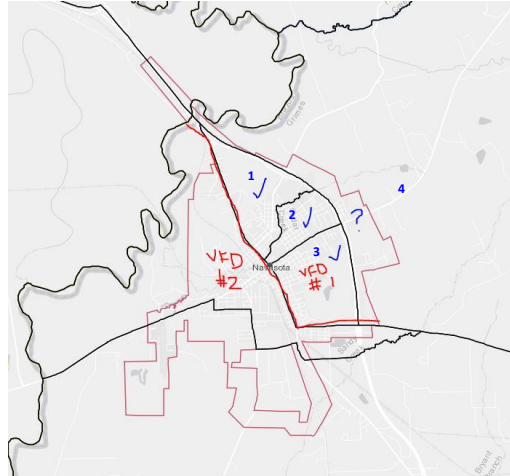


## Updates – Beneficiary/Service Area Guidance



### Example:

- Service area comprised of northeastern half of city
- Service area encompasses three (3) block groups entirely and overlaps a 4th
- Calculate the block-level population within the service area in the 4<sup>th</sup> block group.
- $\geq 70\%$  of the population in the block group must be in the service area
- If  $< 70\%$  of the block group population is in the service area, then Applicant must survey the **ENTIRE** service area.



For example, hypothetically, let's say that a city has two volunteer fire departments, one with a service area comprised of the western half of the city (VFD #2) and one with a service area comprised of the eastern half of the city (VFD #1).

When looking at VFD#1's service area, three of the four block groups that comprise the service are completely enclosed within the service area (the service area boundaries are red). However, the service area overlaps only a portion of the fourth block group (block group boundaries are black).

This being the case, the applicant would need to calculate the block-level (not block group) population within the service area in the 4<sup>th</sup> block group. Using block level data, at least 70% of the population in the 4<sup>th</sup> block group would have to be located within the service area boundaries. If less than 70% of the block group population is in the service area, then the Applicant must survey the entire service area, and LMISD may not be used.



## Updates – Beneficiary/Service Area Guidance



- How to determine the 70% threshold:
  1. Determine total Block Group (BG) population.

// Search / Tables / P1  
**TOTAL POPULATION**  
Survey: Program, Decennial Census    Universe: Total population    TableID: P1    Product: 2010 DEC Summary File 1

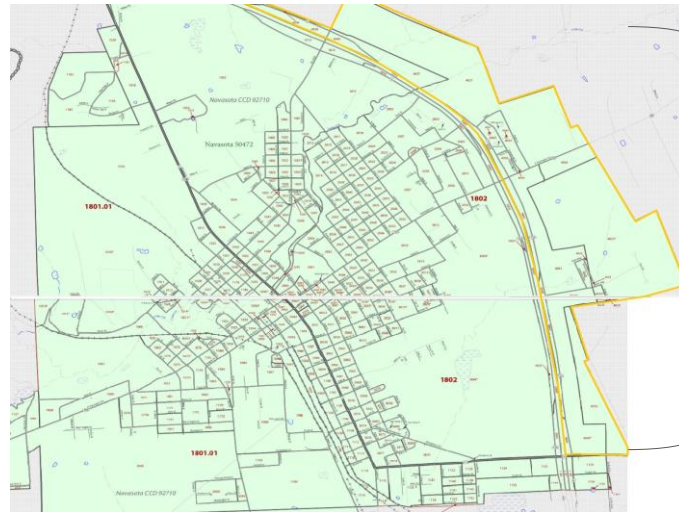
Data Notes	Selections	1 Geography	Years	Topic	Survey	Code	Hide	Filter	Sort	Transpose Table	Margin of Error	Restore Layout	More
Block Group 4, Census Tract 1802, Grimes County, Texas													
Total													
13,348													

2. Determine which Blocks within BG are within the service area.

In order to determine whether a block group meets the 70% threshold, applicants must first determine the total block group population. The total block group population can be found on the census.gov website (Table P1). Next, applicants must determine which blocks within the block group are also within the service area.



## Updates – Beneficiary/Service Area Guidance



Blocks  
within the  
block  
group and  
within the  
service  
area  
(in yellow)

One way to do this is to look at block level maps of the service area. Block level maps like this one can also be found census.gov (<https://www.census.gov/geographies/reference-maps/2010/geo/2010-census-block-maps.html>)

On this map, the area in yellow depicts the census blocks that are within the block group and overlapped by the service area.

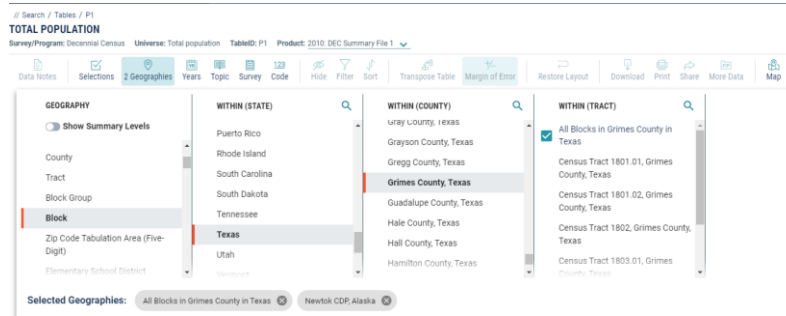




## Updates – Beneficiary/Service Area Guidance



- Collect Block populations
  - Best practice: select “block” geography, navigate to county and select “all blocks” in the specified County



Once the blocks (within both the block group and service area) have been identified, applicants should collect and aggregate block level population data. Block level population data is available on the census.gov website in Table P1. A best practice is to select the “block” geography , navigate to the state, then county and select all blocks in the county.

TDA has found that, in some cases, when selecting the option to only show data from the blocks within a particular census tract, information for all the blocks is not present. As such, we recommend selecting for all the blocks in the county.



## Updates – Beneficiary/Service Area Guidance



- Download .csv file and blocks are listed by Block Group.
  - Find appropriate BG and narrow down the data
- Identify blocks within the service area and determine % of BG population

Block Name	Population
Block 40001, 8-1000 Group A, Census Tract 18002, Grimes Co	0
Block 40023, 8-1000 Group A, Census Tract 18002, Grimes Co	77
Block 40024, 8-1000 Group A, Census Tract 18002, Grimes Co	7
Block 40025, 8-1000 Group A, Census Tract 18002, Grimes Co	0
Block 40026, 8-1000 Group A, Census Tract 18002, Grimes Co	8
Block 40027, 8-1000 Group A, Census Tract 18002, Grimes Co	0
Block 40031, 8-1000 Group A, Census Tract 18002, Grimes Co	0
Block 40034, 8-1000 Group A, Census Tract 18002, Grimes Co	0
Block 40035, 8-1000 Group A, Census Tract 18002, Grimes Co	28
Block 40036, 8-1000 Group A, Census Tract 18002, Grimes Co	0
Block 40037, 8-1000 Group A, Census Tract 18002, Grimes Co	0
Block 40038, 8-1000 Group A, Census Tract 18002, Grimes Co	0
Block 40039, 8-1000 Group A, Census Tract 18002, Grimes Co	0
Block 40040, 8-1000 Group A, Census Tract 18002, Grimes Co	0
Block 40041, 8-1000 Group A, Census Tract 18002, Grimes Co	43
Block 40042, 8-1000 Group A, Census Tract 18002, Grimes Co	24
Block 40043, 8-1000 Group A, Census Tract 18002, Grimes Co	2
Block 40044, 8-1000 Group A, Census Tract 18002, Grimes Co	0
Block 40045, 8-1000 Group A, Census Tract 18002, Grimes Co	0
Block 40046, 8-1000 Group A, Census Tract 18002, Grimes Co	0
Block 40047, 8-1000 Group A, Census Tract 18002, Grimes Co	106
Block 40048, 8-1000 Group A, Census Tract 18002, Grimes Co	15
Block 40049, 8-1000 Group A, Census Tract 18002, Grimes Co	0
Block 40050, 8-1000 Group A, Census Tract 18002, Grimes Co	0
Block 40051, 8-1000 Group A, Census Tract 18002, Grimes Co	1
Block 40052, 8-1000 Group A, Census Tract 18002, Grimes Co	0
Block 40053, 8-1000 Group A, Census Tract 18002, Grimes Co	0
Block 40054, 8-1000 Group A, Census Tract 18002, Grimes Co	1
Block 40055, 8-1000 Group A, Census Tract 18002, Grimes Co	283
Block 40056, 8-1000 Group A, Census Tract 18002, Grimes Co	37
Block 40057, 8-1000 Group A, Census Tract 18002, Grimes Co	0
Block 40058, 8-1000 Group A, Census Tract 18002, Grimes Co	4
Block 40059, 8-1000 Group A, Census Tract 18002, Grimes Co	2
Block 40060, 8-1000 Group A, Census Tract 18002, Grimes Co	0
Block 40061, 8-1000 Group A, Census Tract 18002, Grimes Co	120
Block 40062, 8-1000 Group A, Census Tract 18002, Grimes Co	28
Block 40063, 8-1000 Group A, Census Tract 18002, Grimes Co	0
Block 40064, 8-1000 Group A, Census Tract 18002, Grimes Co	0
Block 40065, 8-1000 Group A, Census Tract 18002, Grimes Co	31
Block 40066, 8-1000 Group A, Census Tract 18002, Grimes Co	0
Block 40067, 8-1000 Group A, Census Tract 18002, Grimes Co	0
Block 40068, 8-1000 Group A, Census Tract 18002, Grimes Co	0
Block 40069, 8-1000 Group A, Census Tract 18002, Grimes Co	0
Block 40070, 8-1000 Group A, Census Tract 18002, Grimes Co	0
Block 40071, 8-1000 Group A, Census Tract 18002, Grimes Co	113
Block 40072, 8-1000 Group A, Census Tract 18002, Grimes Co	0
Block 40073, 8-1000 Group A, Census Tract 18002, Grimes Co	0
Block 40074, 8-1000 Group A, Census Tract 18002, Grimes Co	0
Block 40075, 8-1000 Group A, Census Tract 18002, Grimes Co	91
Block 40076, 8-1000 Group A, Census Tract 18002, Grimes Co	0
Block 40077, 8-1000 Group A, Census Tract 18002, Grimes Co	0
Block 40078, 8-1000 Group A, Census Tract 18002, Grimes Co	0
Block 40079, 8-1000 Group A, Census Tract 18002, Grimes Co	0
Block 40080, 8-1000 Group A, Census Tract 18002, Grimes Co	61
Block 40081, 8-1000 Group A, Census Tract 18002, Grimes Co	3
Block 40082, 8-1000 Group A, Census Tract 18002, Grimes Co	14

Once the block level population data has been requested:

1. Download the .CSV file
2. Identify the blocks within the service area
3. Calculate the block level population of this area and compare to the entire block group population to determine if it meets the 70% threshold.

Using block level data, at least 70% of the population in the 4<sup>th</sup> block group would have to be located within the service area boundaries. If less than 70% of the block group population is in the service area, then the Applicant must survey the entire service area, and LMISD may not be used.



## Updates – Beneficiary/Service Area Guidance



- Use SURVEYS when:
  - The service area **cannot** be “reasonably delineated” by standard census geographic areas
  - For projects with a small benefit area
- Applicants proposing to use a survey in cases where the service area CAN be reasonably delineated by a census geographic area, need to provide a reason for conducting a survey in lieu of the LMISD

Applicants should use the survey method to document beneficiaries for projects when a service area cannot be “reasonably delineated” by standard census geographic areas (place, census tracts or block groups). One example of this could be when service area boundaries encompass portions of a county, but do not correspond to census block group boundaries (i.e. where a geographic area is partially overlain by the service area). Another example would be a project with a small target area benefit, such as proposed sewer line improvements on one or more streets. Applicants proposing to use a survey in cases where the service area CAN be reasonably delineated by a census geographic area, need to provide a reason for conducting a survey in lieu of using the LMISD. This reason should address how/why the LMISD doesn’t reflect the current demographics.

Also, a quick reminder, the cut-off date for receiving “pre-approval” of surveys for the current open application rounds is August 24, 2020.



## Updates – Beneficiary/Service Area Guidance



- For BOTH LMISD & Surveys:
  - Applicants must provide a statement from a qualified individual explaining how the service area was determined
    1. Table 2 – “Justification for the Identified Project Service Area” ; or
    2. Accompanying Letter; or
  - If its part of your beneficiary data, put it in the application. TDA does not “retain” all beneficiary data

Whether an applicant is using LMISD or surveys to document beneficiaries, they must provide a statement from a qualified individual explaining how the service area was determined. For most TxCDBG programs, this statement is located at the bottom of the Table 2, otherwise known as the “Justification for the Identified Project Service Area” box. The qualified individual should not provide just another description of the proposed activities in this box. This box should include a justification for the identified project service area. Applicants may also provide a letter from a qualified individual, that addresses this requirement.

Lastly, please note that if its part of your beneficiary data, put it in the application. TDA does not “retain” all beneficiary data.



## Updates – Beneficiary/Service Area Guidance



- More changes:
  1. HUD now requires that surveys have a Margin of Error (MoE) less than the LMISD MoE. If the MoE for the LMISD data is less than 5%, applicant must contact TxCDBG prior to conducting survey
  2. Surveys and LMISD cannot be combined in any circumstance.
  3. Public Housing Authority (PHA) certifications
    - When conducting a random survey, applicants must survey each unit
    - When conducting a 100% survey, certifications allowed
  4. Nursing Home Facilities are considered a business and not part of the beneficiary population
  5. Applicants cannot combine place and block group data as these data sets have overlapping areas and would likely “double-count” beneficiaries
  6. Alternate Strategies for Conducting Surveys: include phone surveys and mail-in surveys with TxCDBG’s prior written approval

Other updates to the manual include:

1. Margin of Error (MoE) for 2019 LMISD and later. For the 2019 LMISD and later, HUD now includes the MoE for all geographies and requires that the use of alternative data (i.e., an income survey) have a MoE less than the LMISD MoE. TxCDBG surveys are based on a 95% confidence level. Before an applicant undertakes a survey for a geographic area, they must check the MoE in the current LMISD to ensure that the survey will meet this requirement. If an applicant’s LMISD has a MoE of less than +/- 5%, they MUST contact TxCDBG for additional guidance
2. The combination of survey data and LMISD has been determined by HUD to not be methodologically sound and as such is not an acceptable method of documenting beneficiaries. In instances where the service area of a project extends beyond the boundaries of a census designated geographic area, but does not substantially encompass adjacent geographic areas, a survey of the ENTIRE service area would be required.
3. Public Housing Authority (PHA) certifications for income qualified units can only be included in a 100% survey or if the entirety of the PHA is within the proposed project’s service area. If a random survey is conducted, each unit must be treated as a separate household in the comprehensive address list and a questionnaire must be completed for each unit as selected by the random number generator. When using LMISD, PHAs are accounted for in this data and cannot be added.

4. For the purposes of beneficiary identification, nursing homes are considered a “business” and not part of the beneficiary population. This provision is consistent with the LMISD, which excludes nursing home facilities from this data.

5. Applicants cannot combine place and block group data as these data sets have overlapping areas and would likely “double-count” beneficiaries.

6. Applicants using surveys to document beneficiaries must complete a door-to-door survey unless an alternate method is approved, in writing, by the TxDBG program. In communities where social distancing measures or other circumstances limit the feasibility of in person contact, a phone survey may be conducted to collect appropriate household data. In lieu of attempting door-to-door contact with each benefitting household, a TxDBG Survey Questionnaire may be completed via mail as well. In either case, Applicants need TxDBG’s prior written approval, before embarking on an alternative survey method.

Questions?



TEXAS DEPARTMENT OF AGRICULTURE  
**COMMISSIONER SID MILLER**

That concludes our application updates and reminders presentation. Any questions?